

Claudia Wilner

From: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>
Sent: Monday, July 08, 2019 7:21 PM
To: Claudia Wilner
Cc: Darius Charney; Travis England
Subject: RE: BLRR v City of Buffalo

I have to look into this a little more. Apologize, busy few days with the holiday. Will try to respond substantively tomorrow.

From: Claudia Wilner [mailto:wilner@nclej.org]
Sent: Wednesday, July 03, 2019 4:21 PM
To: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>
Cc: Darius Charney <dcharney@ccrjustice.org>; Travis England <england@nclej.org>
Subject: RE: BLRR v City of Buffalo

Rob, thank you for this detailed response. As a first step, we request that you produce all Special Orders memorializing transfers into the Strike Force and Housing Unit so that we can at least determine the dates that officers transferred into those units. We also request that you produce all Special Orders memorializing transfers for all units for the time period immediately following the dissolution of the Strike Force, so that we have confirmation of who was in the Strike Force at the time it disbanded and where those officers transferred. After we process this information, we may have additional follow-up questions, and we reserve our right to seek additional information and documents as needed.

Please confirm in writing by Monday, July 8, whether you agree to produce these documents and the date by which you will make production.

Have a good Fourth of July holiday.

Best,
Claudia



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From: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>
Sent: Wednesday, July 03, 2019 1:30 PM

To: Claudia Wilner <wilner@nclej.org>

Cc: Darius Charney <dcharney@ccrjustice.org>; Travis England <england@nclej.org>

Subject: RE: BLRR v City of Buffalo

My understanding is that transfers (i.e., someone going to or from A-District to Housing) are generally memorized in Special Orders like the attached (which I am providing as a courtesy in an attempt to facilitate good faith discussion).

My understanding is also that those Special Orders are generally organized on Lotus Notes by division that the individual is transferring to, so that you could generally look in a folder for Housing and Strike Force to see special orders like the attached where someone is transferring into that unit.

But, to see when someone transferred out of an assignment would be more difficult because, my understanding is that, you would have to search all of the districts special orders to see if they include anyone transferring from Strike Force or Housing and there are a lot more of them, basically looking through every transfer of every officer in the Buffalo Police Department over the period identified including all new hires.

Also, my understanding is that the centralized employee electronic records (my phrase) would provide information for each officer like Rank, Date of Hire, and current Assignment (i.e., Strike Force, A-District, etc.) but it would not include a timeline of the different assignments of each officer so that would not tell you the start and end dates a person was in a particular assignment.

While I am still looking for other ways, our objections to the interrogatory stand and I don't believe that we are able supplement our response at this point. Please let me know if you'd like to discuss this, and/or if you believe there are other ways to address the issue.

Thanks.

Rob Quinn. (716) 851-4326.

From: Claudia Wilner [<mailto:wilner@nclej.org>]

Sent: Tuesday, July 02, 2019 1:50 PM

To: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>

Cc: Darius Charney <dcharney@ccrjustice.org>; Travis England <england@nclej.org>

Subject: RE: BLRR v City of Buffalo

Rob, on our last call you had committed to getting back to us by last Friday, June 28, regarding your ability to supplement Interrogatory 1 to state, for each officer listed, the exact dates of that officer's employment with the Housing Unit and/or Strike Force, and the timing of your proposed response. We never heard from you. Please respond by tomorrow (Wednesday, July 3) or we will raise this issue with the Court.

Thank you.



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